

FILED

UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT COURT
ROSWELL, NEW MEXICO

for the

District of New Mexico

JUN 20 2016

United States of America

v.

Todd B Jennings

Case No.

MATTHEW J. DYKMAN

CLERK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 03/03/2016 in the county of Eddy in the
Judicial District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

18 USC 1001

False Statements to a Federal Law Enforcement Officer

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Complainant's signature

Trent Boone, BLM LE Ranger

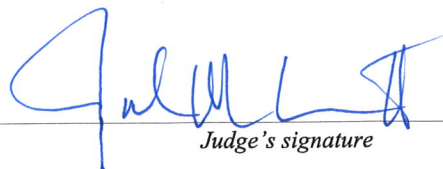
Printed name and title

Sworn to before me and signed in my presence.

Date:

6/18/2016

City and state:

Roswell, New Mexico

Judge's signature

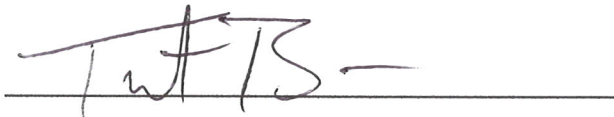
Joel M. Corson, U.S. Magistrate Judge

Printed name and title

Affidavit in support of Criminal Complaint – Todd Jennings

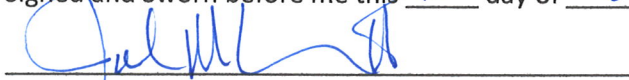
1. I, Trent Boone, am a Bureau of Land Management (BLM) Law Enforcement (LE) Ranger with the U.S. Department of the Interior. I am stationed in Carlsbad, NM and have been in this position for 1 year. In 2015 I successfully completed 16 weeks of Land Management Police Training Program at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. During that time, I was taught the use and practical application of various law enforcement and investigative techniques that Federal Law Enforcement Officers are allowed to employ. In addition to my formalized training of violations of the law at FLETC, I have also acquired knowledge and information pertaining to violations of federal law from numerous other sources, including; formal and informal training, other law enforcement officers and investigators, and my participation in other investigations.
2. The information in this affidavit is based on my personal knowledge and information provided to me by other law enforcement officers and individuals. The information in this affidavit is provided for the limited purpose of establishing probable cause.
3. Overview. On 03 March 2016 while patrolling in the area of La Cueva Trail Head in Carlsbad, NM I observed a silver, Nissan Pickup parked. The Nissan's bed was full of old appliances, washers and driers. This is an area known for illegal dumping of household materials and waste. I approached and noticed a man outside the vehicle disassembling a clothes dryer. I asked the male subject "what are you doing". The male subject stated he had driven out and was looking for parts to sell. I asked the male subject for his driver's license and he said he did not have one. The male subject stated his name was Michael B. SMITH and gave a date of birth of 02/14/1968. A records check through the Federal Law Enforcement Communications Center (FLECC) confirmed no driver's license record found. I issued SMITH a Federal Violation Notice for violating 43 CFR 8341.1(d) NMSS 66-5-39 Driving without a license.
4. On 14 June 2016, the United States Magistrate Judge, sitting in Roswell, New Mexico, ordered that a Bench Warrant be issued for SMITH's arrest due to SMITH's second failure to appear with respect to the 03 March 2016 Federal Violation Notice. SMITH failed to make his first court appearance on 17 May 2016 and again on 14 June 2016.
5. On 17 June 2016 while patrolling on Hidalgo Road south of Carlsbad, NM I observed a silver, Nissan pickup driving on the shoulder of the road with paper items blowing out of the bed. I

recognized the vehicle and the driver from the previous encounter on 03 March 2016. I executed a traffic stop near the intersection of Hidalgo Road and McKittrick Canyon Road. I exited my patrol vehicle and made contact with the driver. The driver was a male subject whom I recognized as Michael B. SMITH from our March 3rd encounter at La Cueva Trail Head. I stated "How's it going Michael"; the male subject stated that I must have him confused with his cousin. The male subject stated he was not Michael B. Smith and he handed me an Arizona Photo ID card with the name of Todd B. JENNINGS, the photo matched the male subject. A records check through the FLECC showed Todd B. JENNINGS to not have a valid Driver's License and showed two warrants out of Arizona. I asked JENNINGS to get out of the vehicle. I detained JENNINGS for the Failure to Appear Warrant that Judge Carson ordered be issued on 06/14/2016 and to conduct further investigation into JENNINGS' false statements concerning his identity. This affidavit and the requested arrest warrant were all reviewed by the Assistant United States Attorney (AUSA) Renee Camacho prior to being submitted to the Court.

A handwritten signature in black ink, appearing to read "Trent Boone", written over a horizontal line.

Trent Boone, BLM LE Ranger

Signed and Sworn before me this 18th day of June, 2016

A handwritten signature in blue ink, appearing to read "Joel M. Carson", written over a horizontal line.

Joel M. Carson, United States Magistrate Judge